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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Compatibility Between Cable Systems
and Consumer Electronics Equipment
ET Docket No. 93-7

Dear Mr. Caton:

Please find attached on behalf of the City of New York an original and eleven copies of the Comments of the City of New York in the above-referenced proceeding.

Any questions regarding the submission should be referred to Eileen Huggard at (212) 788-6549.

Sincerely,



Bruce A. Henoch

Attachment

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JAN 25 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Implementation of Section 17)
of the Cable Television)
Consumer Protection and)
Competition Act of 1992)

Compatibility Between)
Cable Systems and Consumer)
Electronics Equipment)

ET Docket No. 93-7

To: The Commission

COMMENTS OF THE NEW YORK CITY
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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SUMMARY

The City of New York Department of Telecommunications and Energy ("City") supports substantially all of the Commission's proposed regulations in this proceeding. We have made, however, the following additional recommendations and note the following recommended variations from the Commission's proposals.

1. With regard to the requirement that cable operators provide supplementary equipment to enable operation of the extended features of consumer equipment, the City recommends that such supplementary equipment should include stereo outputs on baseband audio and video terminals. In addition, contrary to the rule proposed in the NPRM, the City recommends that cable operators be prohibited from charging for installation of this supplementary equipment under the rate regulation rules.
2. The City agrees that cable systems should be prohibited from scrambling signals on the basic tier of cable service, and recommends that such a prohibition apply to all channels carried on the basic tier including channels beyond those required by FCC rules.
3. The City strongly supports the Commission's proposed requirement that cable operators provide their subscribers with a written education program on equipment compatibility matters. In addition, the City recommends that operators be encouraged or required to produce and carry compatibility education programs, to provide such programs to governmental access operators, and to refer their subscribers to such educational information through announcements in their billing statements.
4. The City believes that the Commission's proposal to require system operators to provide subscribers with a list of sources identifying where compatible, commercially available remote control units can be obtained in the local area is unduly burdensome, and goes unnecessarily beyond the mandates of the 1992 Cable Act.
5. With regard to the Commission's proposed requirement that all cable-ready equipment have the capability to tune a frequency range of 54 MHz to 1 GHz in accordance with the amended EIA/ANSI IS-6 standard, the City recommends that no "migration plan" to full 1 GHz capability be implemented. We believe that such a plan will promote consumer confusion and create a generation of equipment incompatible with new and rebuilt cable systems designed to the 1 GHz standard.
6. The City believes that the currently applicable verification procedure may be insufficient in light of the proposed requirements for cable-ready equipment, and recommends that the Commission subject such equipment to authorization under the certification procedure.
7. The City recommends that until December 31, 1996, manufacturers be prohibited from using the term "cable ready" in connection with their products without disclosure and notification to consumers that, depending on the characteristics of particular cable systems, not all features of their equipment will be usable.

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ET Docket No. 93-7

To: The Commission

COMMENTS OF THE NEW YORK CITY
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

The New York City Department of Telecommunications and Energy ("City of New York" or "City") submits these comments in response to the Federal Communications Commission's ("FCC" or "Commission") Notice of Proposed Rule Making ("NPRM") in the above-captioned proceeding.¹

I. INTRODUCTION

Pursuant to Section 17 of the Cable Television Consumer Protection and Competition Act of 1992 ("1992 Cable Act"),² on October 5, 1993, the Commission reported recommendations and

¹ Implementation of Section 17 of the Cable Television Consumer Protection and Competition Act of 1992 -- Compatibility Between Cable Systems and Consumer Electronics, adopted November 10, 1993 (FCC 93-495) (hereinafter "NPRM").

² Cable Television Consumer Protection and Competition Act of 1992 ("1992 Cable Act"), Pub. L. No. 102-385, 106 Stat. 1460, § 17, codified at 47 U.S.C. § 544A (adding a new Section 624A to the Communications Act of 1934).

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findings to Congress regarding "Means for Assuring Compatibility Between Cable Systems and Consumer Electronics Equipment" ("Compatibility Report")³ that are consistent with the need to prevent theft of service. The Compatibility Report noted that the most significant compatibility problems arise due to signal scrambling security systems used by cable operators, and the concomitant use of set-top converter/descramblers whose tuners currently provide only a single output channel and are capable of descrambling only one channel at a time.⁴ Most of the interface problems are caused from placing the set-top device's tuner ahead of the tuner in television receivers and videocassette recorders ("VCR"),⁵ thus rendering their internal tuners superfluous and consequently disabling their advanced features.

Section 624A(b) of the 1992 Cable Act requires the Commission to issue regulations, within 180 days of the Compatibility Report's submission to Congress, that assure equipment compatibility consistent with the need to prevent theft of cable service.⁶ The Act requires further that

the Commission shall determine whether and, if so, under what circumstances to permit cable systems to scramble or encrypt signals or to restrict cable systems in the manner in which they encrypt or scramble signals, except that the Commission shall not limit the use of scrambling or encryption technology where the use of such technology does not interfere with the

³ Report to Congress On Means for Assuring Compatibility Between Cable Systems and Consumer Electronics Equipment, adopted October 5, 1993 ("Compatibility Report").

⁴ Compatibility Report at 31.

⁵ Id. at 10. These were the findings of the Joint Engineering Committee ("JEC") formed by the Electronic Industries Association ("EIA") and the National Cable Television Association ("NCTA").

⁶ 47 U.S.C. § 544A(b)(1) (1993).

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functions of subscribers' television receivers or video cassette recorders.⁷

The NPRM adopted on November 10, 1993, drew upon several recommendations and proposals expressed in the Compatibility Report concerning both immediate improvements and long-term approaches to achieving full compatibility. These proposed rules include:

- prohibiting the scrambling of signals on the basic service tier;
- requiring cable systems to provide consumer education programs;
- requiring cable systems to provide subscribers, upon request, with the option of having all unscrambled signals passed directly to their TV receivers or VCR without passing through the set-top device;
- requiring cable systems to provide upon request supplementary equipment such as set-top devices with multiple descramblers and/or timers etc. necessary to enable operation of extended features found in consumer equipment;
- requiring cable operators that offer subscribers the option of renting remote control units to (1) notify customers that they may also purchase a commercially available remote control device, (2) specify the types of remote control units that are compatible with its equipment, and (3) permit the operation of their set-top devices with such commercially available remote control units, or otherwise take no action that would prevent the use of them;
- requiring cable systems built or rebuilt after a certain date to use the EIA/ANSI IS-6 channel plan, and requiring all cable systems to use this channel plan after 10 years;
- adopting new standards for all consumer electronics equipment that is marketed as "cable ready"; such standards include (1) requiring a Decoder Interface connector, (2) requiring the ability to tune all the channels specified in the EIA/ANSI IS-6 standard, and (3) requiring improved tuner performance and shielding;
- requiring cable systems to provide service in a form that is compatible with the Decoder Interface and related equipment used with its connector; and
- requiring cable operators to provide component descramblers and additional equipment necessary for use with Decoder Interface connector without separate charge for the equipment or its installation.

The City commends the Commission for its rational and efficient balancing of the competing interests implicated in

⁷ 47 U.S.C. § 544A(b)(2).

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issues of equipment compatibility, and welcomes this opportunity to comment on the specific measures contained in the NPRM. We support substantially all of the Commission's proposed regulations in this proceeding. As discussed below, we propose the following additional recommendations and note the following recommended variations from the Commission's proposals.⁸

II. DISCUSSION

A. Proposals for Existing Equipment

The City of New York agrees that cable operators who scramble signals should be required to provide supplementary equipment that enables the operation of extended features and functions of consumer equipment at the request of individual subscribers, and should further be required to provide subscribers with the option of having all non-scrambled signals connected directly to their equipment, without passing through the set-top device.⁹

The City notes that such supplementary equipment will inevitably entail the use of devices such as multiple descramblers, timers, signal splitters, and by-pass switches, and recommends that this equipment include stereo outputs on baseband audio and video terminals.

⁸ The City notes that security systems using scrambling or encryption technology are at the root of the compatibility problems addressed by Section 624A of the 1992 Cable Act. Pursuant to that Section, the Commission has authority to prohibit, consistent with the need to prevent theft of service, the use of all such systems that interfere with TV and VCR functions. Therefore, the City recommends careful evaluation of alternative and developing security systems that deliver all authorized channels in the clear and eliminate the need for additional equipment in the subscriber's premises. See Compatibility Report at 23.

⁹ NPRM, para. 12.

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With regard to whether and how cable operators should be allowed to charge for such supplementary equipment, the City believes that charges for the equipment should be in accordance with the rate regulation rules for customer premises equipment used to receive the basic service tier.¹⁰ Contrary to the rule proposed in the NPRM, however, the City recommends that cable operators be prohibited from charging for installation of this supplementary equipment under the rate regulation rules. Subscribers will already be forced to pay higher monthly rental fees for supplementary equipment that is necessitated by the operator's decision to scramble signals, and should not also be forced to pay for the installation of such equipment, which is required to correct a compatibility problem created by the operator's choice of a security system. Furthermore, such a prohibition will encourage cable operators to inform subscribers fully of installation options at the time of the initial installation.

The City agrees that cable systems should be prohibited from scrambling signals on the basic tier of cable service.¹¹ This will tend to ensure that reception of at least the basic tier will not require the use of a set-top device. The City believes that such a prohibition must apply to all channels carried on the basic tier, and should include channels beyond those required by FCC rules.¹² Although such a rule might encourage system operators to remove from the basic tier all

¹⁰ See 47 C.F.R. § 76.923.

¹¹ NPRM, para. 13.

¹² See 47 C.F.R. § 76.901.

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signals not required by FCC rules, consumer confusion and inconvenience will be minimized by requiring that all signals carried on the basic tier be delivered in the clear, and therefore in a form most compatible with consumer equipment.

The City supports the Commission's proposal to require cable operators who offer subscribers the option of renting remote control units for set-top devices to permit the operation of such devices with commercially available remote control units, or otherwise take no action to prevent the use of them except where a subscriber requests that the remote functions of the set-top device be disabled.¹³ As the Commission notes, such requirements are consistent with the provisions of Section 17 of the 1992 Cable Act.¹⁴

The City strongly supports the Commission's proposed requirement that cable operators provide their subscribers with an education program on equipment compatibility matters.¹⁵ We agree that such information should be provided in writing at the time of subscription and at least once a year thereafter, and should include notification to subscribers regarding which features of their equipment may be disabled due to system incompatibilities as well as suggestions for resolving such problems. In addition, the City recommends that operators be encouraged or required to produce and carry compatibility education programs on their systems, to provide such programs to governmental access operators, and to refer their subscribers to

¹³ NPRM, para. 14.

¹⁴ See § 624A(c)(2)(D), (E).

¹⁵ NPRM, para. 15.

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such educational information through announcements in their billing statements.

With regard to the Commission's proposed requirement that cable operators provide subscribers with written notification that compatible remote control units may be purchased from other sources,¹⁶ the City supports such a requirement. The City also agrees that a cable system should be required to specify which commercially available remote control units are compatible with the set-top devices that the system employs, as required by Section 17 of the 1992 Cable Act. System operators should contact major manufacturers of remote control units, compile a list of compatible units from each manufacturer, and include in the written notification provided to subscribers the name, address, and telephone numbers of each manufacturer of compatible units along with the model numbers of such units.

The City, however, believes that the Commission's proposal to require system operators to provide a list of sources of where those models can be obtained in the local area is unduly burdensome, and goes unnecessarily beyond the mandates of the 1992 Cable Act.¹⁷ In a city like New York, such a list could be extremely long and would be subject to constant revision. We see no need to impose this requirement on system operators, which would entail repeated surveys of numerous local retailers. We believe consumers are capable of locating convenient sources for equipment if they are supplied with pertinent information

¹⁶ NPRM, para. 16.

¹⁷ Section 624A(2)(D)(ii) only requires specification of compatible types of remote control units, not commercial sources for them.

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regarding the makes and model numbers of compatible units.

The City agrees that the Commission's proposals for addressing compatibility problems associated with existing cable systems and consumer equipment do not impose significant burdens on cable operators, and can be implemented quickly.¹⁸ We consequently foresee no difficulties in making these requirements effective six months after FCC adopts final rules in this proceeding.

B. Proposals for New Equipment

The City has long believed that a complete solution to compatibility problems can only be achieved through both inter-industry cooperation and consultation with government regulatory agencies. We applaud therefore the efforts of the Commission and the Cable-Consumer Electronics Advisory Group ("CAG") in developing standards for new and rebuilt cable systems and for new consumer equipment.¹⁹

The City fully supports CAG's recommendation and the Commission's proposal to require use of an updated Decoder Interface connector and component descrambler unit.²⁰ The City concurs that currently this is the most practical solution for

¹⁸ NPRM, para. 17.

¹⁹ In accordance with its comments in response to the Notice of Inquiry ("NOI") adopted by the Commission on January 14, 1993, Notice of Inquiry, ET Docket No. 93-7, 8 FCC Rcd 725 (1993), the City continues to believe that effective solutions will not be reached unless all affected and interested groups are involved in the process. See Comments of the New York City Department of Telecommunications and Energy in ET Docket No. 93-7, dated March 22, 1993 ("NOI Comments"). See also letter dated April 17, 1991 from William F. Squadron, Commissioner of the New York City Department of Telecommunications and Energy, to Alfred Sikes, then Chairman of the FCC.

²⁰ NPRM, para. 19.

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ensuring compatibility between the scrambling technologies used by cable operators to prevent theft of service and the advanced functions of consumer equipment. Deployment of these units will eliminate the need for a set-top device and will permit the use of advanced equipment features by placing the descrambling unit after the internal TV and VCR tuners.

The City agrees that cable systems and equipment manufacturers must be required to adhere to the amended EIA/IS-6 channel identification plan. We foresee no problem in this regard because, as the Commission notes, the plan itself will be the joint creation of the cable television and consumer electronics industries.²¹

The City observes that in recent years consumers have been confused by the differing capabilities of various equipment marketed as "cable ready." The City fully supports therefore the adoption of new standards for such equipment that would require a Decoder Interface connector conforming to the updated EIA/ANSI 563 standard--which will be a hybrid analog/digital Decoder interface--coupled with new shielding and tuner standards.

The City believes that a 1 GHz upper boundary is an appropriate range of channels for cable-ready equipment and notes that new cable systems are being designed with that standard in mind.²² Therefore, a requirement that all cable-ready equipment have the capability to tune a frequency range of 54 MHz to 1 GHz

²¹ The plan is now being developed by the Joint Engineering Committee ("JEC") of the Electronics Industries Association / Consumer Electronics Group ("EIA") and the National Cable Television Association ("NCTA").

²² NPRM, para. 21.

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in accordance with the amended EIA/ANSI IS-6 standard is a reasonable and necessary one. However, the City recommends that no "migration plan" to full 1 GHz capability be implemented. We can see no benefit in such a plan. On the contrary, we believe it will promote consumer confusion and create a generation of equipment incompatible with new and rebuilt cable systems designed to the 1 GHz standard.

With respect to the Commission's proposed new requirements for improved receiver performance in cable-ready consumer equipment,²³ the City fully supports leakage, interference, and emission standards that have been developed to prevent Direct Pick Up ("DPU") interference. These are especially critical in urban areas like New York City, where susceptible transmitters may be in close proximity to cable television installations. We also agree that the existing Part 15 isolation standards²⁴ (after adjustment to specify frequencies up to 1 GHz) should be applied to all input selector switches, including stand-alone units, and that all such switches and devices used to bypass set-top devices or other equipment should be required to not attenuate input cable signals more than 6 dB at any output port.

In light of the proposed requirements for cable-ready equipment and component decoders/descramblers, which entail substantial improvements in technical performance standards, the City believes that the currently applicable verification

²³ NPRM, para. 22-23.

²⁴ See 47 C.F.R. §§ 15.115(c), 15.117(h).

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procedure²⁵ may be insufficient.²⁶ We therefore recommend that the Commission subject such equipment to authorization under the certification procedure. This would allow the FCC to more easily monitor compliance with the proposed requirements by simply referring to the test results submitted to the FCC. It would also, we believe, encourage compliance with the new regulations.

The City agrees with the Commission's proposal requiring all equipment manufactured or imported after December 31, 1996, that is marketed as "cable ready" to comply with the new cable-ready standards.²⁷ In addition, we recommend until that date manufacturers be prohibited from using the term "cable ready" in connection with their products without disclosure and notification to consumers that, depending on the characteristics of particular cable systems, not all features of their equipment will be usable.

The City also supports the Commission's proposed requirements that cable system operators either use "in the clear" signal delivery methods or provide any equipment that may be needed to process scrambled and/or digital video service through the Decoder Interface connector.²⁸ Where "in the clear" delivery methods are not used, cable systems must provide service in a form that is compatible with the Decoder Interface and related component descrambler/decoder equipment. Absent such requirements, equipment compatibility will remain an unfulfilled

²⁵ See 47 C.F.R. § 2, Subpart J.

²⁶ NPRM, para. 27.

²⁷ NPRM, para. 28

²⁸ NPRM, para. 29.

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promise, and the purpose of Section 17 will be frustrated.

The City of New York believes that cable operators should be required to provide a component descrambler/decoder for all subscriber equipment that is supplied with a Decoder Interface connector, and that they should not be permitted to apply separate charges either for the equipment or its installation. Although the City is concerned about apparent inconsistencies between the treatment applied here and the treatment applied under rate regulations,²⁹ we note, as did the Commission,³⁰ that component descrambler/decoder equipment is not intended for sale to subscribers and that the need for such devices is created by the system operator's decision to scramble signals. The need for and functions of this equipment are dictated by cable system security and operations. Therefore, considering such equipment as part of the cable system plant is entirely reasonable.³¹ Further, imposing additional charges on subscribers for equipment that is needed due to the operator's independent conduct, and which the operator undertakes for its own benefit, is fundamentally unfair.

The City supports the standardized channelization requirements reflected in the amended EIA/ANSI IS-6 plan, and views the Commission's proposal to require that new or re-built cable systems use this plan after one year from the effective date of these rules (applicable to all cable systems after ten

²⁹ See 47 C.F.R. § 76.923. The rules require the unbundling of rates for cable programming services from those for installation and lease of equipment used to receive such services.

³⁰ Compatibility Report at 65.

³¹ See 47 C.F.R. § 76.922.

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years) as entirely reasonable.

III. CONCLUSION

The City of New York respectfully urges the Commission to adopt the measures recommended in these comments. We believe that the adoption of these measures will promote the statutory objective, embodied in Section 17 of the 1992 Cable Act, of assuring that consumers "enjoy the full benefit of both the programming available on cable systems and the functions available on their televisions and video cassette recorders."

Respectfully Submitted,

NEW YORK CITY DEPARTMENT OF
TELECOMMUNICATIONS AND ENERGY

By: 

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Dated: January 25, 1994

CERTIFICATE OF SERVICE

I, Mildred Engel, certify that on this 25th day of January 1994, copies of the foregoing comments of the New York City Department of Telecommunications and Energy were served by first class mail, postage prepaid, to the persons on the attached service list.


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